IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

TALIA HARRISON,

Plaintiff,

VS.

Civil Action No. 4:21-cv-607-ALM

TYLER TECHNOLOGIES, INC.,

Defendant

UNOPPOSED MOTION TO EXTEND DISCOVERY PERIOD FOR SEVEN (7) DAYS

Plaintiff Talia Harrison files this Unopposed Motion to Extend the Discovery Period and requests that this Court extend the discovery period in this case for seven (7) days through and including April 28, 2022. In support of this motion, Plaintiff shows as follows:

- 1. This FLSA overtime action was filed on August 3, 2021. [Dkt. 1]
- 2. Discovery is currently scheduled to end on April 21, 2022.
- 3. Plaintiff and Defendants have engaged in written discovery and are currently attempting to resolve outstanding discovery disputes regarding written discovery.
- 4. The Parties cannot resolve their outstanding discovery disputes prior to the end of the current discovery period and require additional time to confer.
- 5. In an attempt to resolve the discovery disputes without court involvement, and to avoid unnecessary motion practice, Plaintiff requests a one-week extension of the discovery period through and including April 28, 2022, for the sole purpose of permitting the Parties to continue their negotiations as to these written discovery disputes.
- 6. Defendant does not oppose this request.
- 7. This request is being made in good faith and not for the purpose of undue delay.

This 20th day of April 2022,

Respectfully submitted,

SHELLIST LAZARZ SLOBIN LLP

s/Melinda Arbuckle

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CERTIFICATE OF CONFERENCE

Counsel for Plaintiff conferred with counsel for Defendant regarding the relief requested in this Unopposed Motion on April 20, 2022 by telephone. Counsel for Defendant confirmed it is unopposed to the relief requested herein.

s/Melinda Arbuckle	
Melinda Arbuckle	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 20, 2022, a true and correct copy of the above was filed using the Court's CM/ECF system causing electronic service to be affected upon all counsel of record.

s/Melinda Arbuckle
Melinda Arbuckle